

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISUAL INTERACTIVE PHONE CONCEPTS, INC.,)
)
Plaintiff/Counterclaim-Defendant,) Civil Action No. 1:11-cv-05289
)
)
v.) Hon. Elaine E. Bucklo
)
UNITED STATES CELLULAR CORPORATION,)
)
)
Defendant/Counterclaim-Plaintiff.)

**VISUAL INTERACTIVE PHONE CONCEPTS INC.’S MOTION FOR LEAVE TO FILE
CERTAIN EXHIBITS TO ITS OPPOSITION MEMORANDUM OF LAW UNDER SEAL**

Plaintiff Visual Interactive Phone Concepts, Inc. (“VIPC”) respectfully submits this motion for leave to file certain exhibits to its memorandum of law in opposition to the Motion of U.S. Cellular Corporation (“U.S. Cellular”) to Strike Plaintiff’s Infringement Contentions and to Dismiss Plaintiff’s Claim of Infringement (the “Motion”) under seal pursuant to Local Rule 26.2 and Local Patent Rule 1.4.

VIPC, in its memorandum of law in opposition to the Motion, intends to quote from and attach as exhibits certain diagrams and excerpts from U.S. Cellular documents entitled, “USCC MPLS Core” and “LTE-CDMA Overlay End to End Architecture, Version 1.4,” as Exhibits 6 and 7, respectively (the “Exhibits”). U.S. Cellular has designated these exhibits “Confidential” under the Local Rule Model Protective Order, operative in this case pursuant to Local Patent Rule 1.4.

Accordingly, VIPC respectfully requests that the Court enter an order (a) approving the filing of the Exhibits under seal, and (b) approving the filing of a version of VIPC’s memorandum of law in opposition to the Motion with quotations from the Exhibits redacted.

Dated: December 5, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on December 5, 2014, I caused the foregoing document to be served by ECF filing upon:

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Dated: New York, New York
December 5, 2014

/s/Gerry Silver
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